

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	) NO. 15-4268 JB
	) NO. 16-1613 JB
vs.	) NO. 15-4275 JB
	) NO. 15-4269 JB
ANGEL DELEON, et al.,	)
ANTHONY RAY BACA, et al.,	)
CHRISTOPHER GARCIA,	)
MAURICIO VARELA, et al.,	)
	)
Defendants.	)

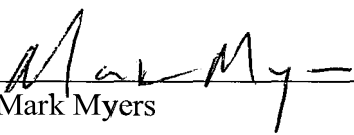
**STATEMENT OF CAUSE**

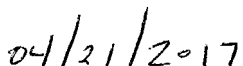
1. On April 17, 2017 at approximately 1000 hours, Special Agent (SA) Bryan Acee met with a cooperating witness ("CW") and his attorneys at the Sandoval County Detention Center. During that meeting, the CW notified SA Acee that there was a way to bypass the security of the tablets, reset them, and enable the internet and camera functions of the tablet.

2. The CW then proceeded to advise SA Acee how this could be accomplished and how the tablet could be reset to its original platform, thus enabling all of the functions of the tablet, including the camera and internet. According to the CW, all of the discovery stored on the tablet is wiped by resetting the tablet.

3. On 04-17-2017, at approximately 1632 hours, to prove his point, the CW sent SA Acee an email from his tablet. Additionally, on 04-18-2107, at approximately 0015 hours, a different CW sent SA Acee an email from his tablet, which included a picture of himself in his jail cell. According to the CW, the picture was taken from his tablet and subsequently emailed from his tablet. It is believed at this time, anyone who figures out how to reset their tablet will be able to access the internet, camera, and any/all other functions capable on the tablet.

I certify, under penalty of perjury, that the above information is true and correct.

  
Mark Myers

  
Date